

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

PRIMITIVO ROBLES, on behalf of himself and
all others similarly situated,

Case No. 1:24-cv -07658-MKV

Plaintiff,

March 5, 2025

v.

CAPRI HOLDINGS 2 LLC *d/b/a* BUDR
CANNABIS,
Defendant.

**DECLARATION OF STEVEN J. STAFSTROM, ESQ.
IN SUPPORT OF CAPRI HOLDINGS 2 LLC'S MOTION TO DISMISS**

I, Steven J. Stafstrom, Esq., declare under penalty of perjury that the foregoing is true and correct:

1. I am over the age of eighteen years, and I believe in the obligations of an oath. The facts stated herein are based on my personal knowledge.
2. I am a Member of the law firm Pullman & Comley LLC.
3. I represent Capri Holdings 2 LLC in the above-captioned matter.
4. I submit this declaration in support of Capri Holdings 2 LLC's motion to dismiss the action in the Southern District of New York captioned *Primitivo Robles v. Capri Holdings 2 LLC d/b/a Budr Cannabis*, Case No. 1:24-07658-MKV.
5. On March 3, 2025, my office searched the Public Access to Court Electronic Records ("PACER") system for cases involving a party by the name of Primitivo Robles in the Southern District of New York. The search generated a list of twenty-four (24) cases brought by Primitivo Robles. A true and accurate copy of the list of results from this PACER search is attached hereto as **Exhibit A**.
6. It appears from inspecting the twenty-four (24) complaints that they were each brought by the Primitivo Robles who is the plaintiff in the instant action.

7. Based on my review of the twenty-four (24) complaints, they appear to be virtually identical to one another.

Executed on: March 5, 2025.



Steven J. Stafstrom, Esq.

CERTIFICATION

I certify that a copy of the above was or will immediately be mailed or delivered electronically or non-electronically on March 5, 2025 to all counsel and self-represented parties of records and that written consent for electronic delivery was received from all counsel and all self-represented parties of record who were or will immediately be electronically served.

Joseph & Norinsberg, LLC
Jon L. Norinsberg, Esq.
Bennitta L. Joseph, Esq.
110 East 59th Street
Suite 2300
New York, New York 10022
jon@norinsberglaw.com
bennitta@employeejustice.com

/s/ Steven J. Stafstrom
Steven J. Stafstrom, Esq.